

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Lisa Lou Ann Thomason)
)
Plaintiff,)
)
)
)
vs.)
)
NHC Mauldin, Deborah Dobson,)
Administrator, Linda Knight,)
Human Resources and Tiffany LNU,)
)
)
Defendants.)
)

COME NOW THE DEFENDANTS, reserving all motions to dismiss and answering the Plaintiff's Complaint, and respectfully show unto the Court as follows:

FOR A FIRST DEFENSE

1. The Defendants deny each and every allegation set forth in the Complaint which is not hereinafter specifically admitted or to which a response is not otherwise provided.
2. The Defendant NHC Mauldin admits that it is a long-term residential care facility located in Greenville County, South Carolina.
3. The Defendant Deborah Dobson admits that she is a citizen and resident of Greenville County, South Carolina and is employed as the Administrator of NHC Mauldin.
4. The Defendant Linda Knight admits that she is a citizen and resident of Spartanburg County, South Carolina and is employed by NHC Mauldin.
5. The Defendants are unable to identify the Defendant "Tiffany LNU" and, therefore, are unable to respond to any allegations presented in the Complaint with respect to this

individual.

6. The Defendants deny the allegations in Paragraph III (1), (2), (3), (4), (5), (6), (7), (8) and (9) of the Complaint.

FOR A SECOND DEFENSE

7. The individual "Tiffany LNU" is not properly named, identified, joined and /or served as a Party in this matter.

FOR A THIRD DEFENSE

8. The Plaintiff's Complaint fails to state facts sufficient to constitute any cause of action against any properly named Defendant in this matter.

FOR A FOURTH DEFENSE

9. Any claims or causes of action properly alleged by the Plaintiff in this matter are barred by the exclusive remedy provision of the South Carolina Workers' Compensation Law.

FOR A FIFTH DEFENSE

10. Any claims or causes of action properly alleged by the Plaintiff in this matter are barred by the applicable statute of limitations.

FOR A SIXTH DEFENSE

11. This Court lacks subject matter jurisdiction over any properly alleged claims or causes of action set forth in the Plaintiff's Complaint.

JURY TRIAL REQUEST

12. The Defendants join with the Plaintiff in her request for a Jury Trial as part of this matter.

NANCE, MCCANTS & MASSEY

By: s/ Clarke W. McCants, III

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Dated: August 21, 2013